

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LEGRAIN WINSTON, et al.	)	
	)	Case No. 18-cv-05726
Plaintiffs,	)	
	)	Hon. Matthew F. Kennelly
v.	)	
	))	
THOMAS J. DART, et al.	)	
	)	
Defendants.	)	

**MOTION FOR EXTENSION OF TIME  
TO FILE REPLY IN SUPPORT OF MOTION TO DISMISS**

Defendants THOMAS J. DART, JOSEPH RANZINO, GREGORY SHIELDS, THOMAS NEAL, CHRISTOPHER ROHLOFF, and COOK COUNTY (“Defendants”) by and through their attorney, Justin L. Leinenweber, Leinenweber Baroni & Daffada, LLC as Special State’s Attorney, respectfully move this Court for an extension of time to file Defendants’ Reply in Support of Motion to Dismiss. In support of their Motion, Defendants state as follows:

1. Plaintiffs filed their Complaint on August 21, 2018, alleging they suffered race discrimination and retaliation while employed with the Cook County Sheriff’s Office.
2. The Cook County State’s Attorney’s Office filed a motion to dismiss Plaintiffs’ Complaint on March 5, 2019, and Defendants responded on April 9, 2019. Defendants’ reply is currently due to be filed on April 23, 2019.
3. The undersigned counsel was engaged on April 18, 2019, to represent Defendants in this matter. The undersigned counsel requires additional time to discuss this matter with his clients and to become acquainted with the facts in this case and the relevant statutes and case law.

4. Accordingly, Defendants respectfully request that the Court grant them an additional seven (7) days to file their reply in support of Defendants' Motion to Dismiss, up to and including April 30, 2019.

5. Defendants were unable to speak with Plaintiffs' counsel prior to filing this motion to determine their position on this motion.

6. Counsel for Defendants files this motion in good faith and not for the purpose of improper delay.

WHEREFORE, Defendants respectfully request this Honorable Court grant them until April 30, 2019, to file their reply in support of their Motion to Dismiss Plaintiffs' Complaint.

Respectfully Submitted,

By: /s/ Justin L. Leinenweber  
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